

Exhibit A

Class Action Settlement, Google + Bing
5th Floor at 280 South 1st, San Jose,
CA 95113

Honorable Edward J Davila of the U.S.
District Court for the northern District of
California, granted preliminary approval
of this Class action Settlement

RECEIVED

SEP 15 2020

SUSAN Y. SOCHT
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE

4. Details Concerning Eligibility

You must be able to check all of the following boxes in order to be eligible to receive a settlement payment. Check each box below that represents a true statement about your use of Google+.

- ☒ I was a user of the consumer Google+ service while a resident of the United States at some point during the period from January 1, 2015 to April 2, 2019;
- ☒ My Email address associated with my Google+ account was _____.
- ☒ I entered private (meaning non-public) information in at least one of my Google+ profile fields that was not set to be shared publicly²; and
- ☒ Either I shared that information with another Google+ user through the Google+ service or I authorized an app to access my Google+ profile field information.

5. Verification

By signing below and submitting this claim form I hereby affirm under oath that: (1) I am 18 years of age or older; (2) I am the person identified above (or, if the person identified above is a minor, I am the parent or guardian of that person); and (3) the information provided in this Claim Form is, to the best of my knowledge, true and correct.

8-28-20
Date

Angelica Sheppard
Signature

Angelica Sheppard
Printed Name

THIS CLAIM FORM MUST BE SUBMITTED ON THE SETTLEMENT WEBSITE NO LATER THAN _____, 20__, OR MAILED TO THE CLAIMS ADMINISTRATOR BY PREPAID, FIRST-CLASS MAIL POSTMARKED NO LATER THAN _____, 20__ TO:

[ADDRESS]

² The list of profile fields is available at [\[URL on settlement admin website\]](#).

CLAIM FORM

1. You may be eligible to receive a cash payment if you submit this Claim Form.

Settlement Class Members who submit a Claim may be eligible to receive cash payments in an amount up to a maximum of \$12.00, depending on the total number of Claimants. Each Settlement Class Member is allowed to submit no more than one claim, regardless of the number of Google+ accounts the Class Member had.

Settlement Class Members whose Claims are determined to be valid will receive their payments via the Electronic Payment method specified below. Claimants must fully complete all sections of this form.

2. Name and Contact Information of Claimant

Angelica
First Name

Sheppard
Last Name

P.O. Box 1177
Street Address

Pittsburg
City

TX
State

75666
Zip Code

Angelica Sheppard 33@gmail.com
Email address associated with Claimant's Google+ account

3. Election of Electronic Payment Format

Please indicate your preferred method of payment and provide the required Electronic Payment information. Please choose only one of the below options.

☐ PayPal

Provide Your PayPal Account Email Address

☒ Digital Check

Angelica Sheppard 33@gmail.com
Provide Your Primary Email Address¹

¹ Claimants who elect to receive a digital check and who submit a Valid Claim will be contacted at the email address provided here with instructions for receiving the digital check.

Notice of Class Action Settlement

You are not being sued. This notice affects your rights. Please read it carefully.

On _____, 20____, the Honorable Edward J. Davila of the U.S. District Court for the Northern District of California, granted preliminary approval of this class action Settlement and directed the litigants to provide this notice about the Settlement. You have received this notice because Google's records indicate that you may be a Settlement Class Member, and you may be eligible to receive a payment from the Settlement. Please visit www.GooglePlusDataLitigation.com for more information. The Final Approval Hearing on the adequacy, reasonableness, and fairness of the Settlement will be held at 9:00 [am/pm] on _____, 20____ in San Jose Courthouse, Courtroom 4, 5th Floor located at 280 South 1st Street, San Jose, CA 95113. You are not required to attend the Final Approval Hearing, but you are welcome to do so at your own expense.

Summary of Litigation

Google operated the Google+ social media platform for consumers from June 2011 to April 2019. In 2018, Google announced that the Google+ platform had experienced software bugs between 2015 and 2018, which allowed app developers to access certain Google+ profile field information in an unintended manner. Plaintiffs Matthew Matic, Zak Harris, Charles Olson, and Eileen M. Pinkowski thereafter filed this lawsuit asserting various legal claims on behalf of a putative class of Google+ users who were allegedly harmed by the software bugs ("Class"). Google denies Plaintiffs' allegations, denies any wrongdoing and any liability whatsoever, and believes that no Class Members, including the Plaintiffs, have sustained any damages or injuries due to the software bugs.

Summary of Settlement Terms

Settlement Fund: Under the Settlement, Google will pay \$7.5 million which will be used to fund: (1) Class Member Settlement payments; (2) attorneys' fees not to exceed 25% of the Settlement Fund and costs and expenses not to exceed \$200,000.00; (3) four service awards to the Class Representatives in an amount not to exceed \$1,500 each for their services on behalf of the Settlement Class and for a general release of all claims they may have against Google; (4) administration fees and costs; and, if necessary, (5) cy pres distribution of any residual funds. No portion of the Settlement Fund can be returned to Google.

Amount of Payments: Class Members who submit a Valid Claim may receive a pro rata share of the Net Settlement Fund up to a cash payment of \$12.00 depending on the number of claimants. Each Class Member can submit only one claim. Any funds remaining in the Net Settlement Fund after distribution(s) to Class Members will be distributed to Cy Pres Recipients that have been selected by a neutral third party and approved by the Court.

Method of Payment: The payments above for Class Members who submit a Valid Claim will be made by Electronic Payment (Paypal or Digital Check).